

11 RF 3322

# EG&G ROCKY FLATS

DIST.	CIR	ENG
RETZKE, J.C.		
URLINGAME, A.H.		
OPP, R.D.		
ROUCHER, D.W.		
AVIS, J.G.		
VERED, J.E.	X	X
ERRERA, D.W.		
ERRIS, L.R.		
RAIKOR, F.J.		
RANCIS, G.E.	X	X
OODWIN, R.		
EALY, T.J.		
JEKER, F.H.		
ENS, J.P.		
EELE, P.B.		
ERASH, J.M.		
IRBY, W.A.		
IRKEBO, J.A.		
EE, E.M.	X	X
AJESTIC, J.B.		
ATHEWS, T.A.		
EURRENS, B.E.		
ORGAN, R.V.	X	X
ORTH, P.		
ALMER, L.A.		
OTTER, G.L.	X	X
ZAITO, V.M.		
HOADES, J.I.	X	X
AEFEIL, R.E.		
ANSON, E.R.		
IEBE, J.S.		
ILKINSON, R.B.		
ILLIAMS, R.E.		
ILSON, J.M.		
UNG, E.R.		
INE, J.O.	X	X
Schubert	X	X
Greer	X	X
Wetrich	X	X
Johnson	X	X
Burke	X	X
Reichman	X	X
Church	X	X
Johnson	X	X
Mathews	X	X
McMullen	X	X
WM	X	X
FORRES CONTROL	X	X
AFFIC		

EG&G ROCKY FLATS, INC.

ROCKY FLATS PLANT, P.O. BOX 464, GOLDEN, COLORADO 80402-0464 • (303) 966-7000

June 10, 1991

91-RF-3322

Robert M. Nelson, Jr.  
Manager  
DOE, RFO

Attn: Jim Kiefer

MINUTES OF MAY 22, 1991 MEETING WITH COLORADO DEPARTMENT OF HEALTH -  
JMK-0184-91

Enclosed is a draft letter to the Colorado Department of Health (CDH), which submits minutes that resulted from a meeting on May 22, 1991, between representatives of CDH, DOE, RFO and EG&G Rocky Flats, Inc. The purpose of the meeting was to make CDH aware of our intent to construct a new process waste evaporator in Building 374 and to discuss RCRA permitting issues which may impact the project schedule.

The primary conclusion resulting from the meeting was that construction of the evaporator may not begin until we receive a RCRA Part B Permit from CDH. This position is in conflict with guidance previously given by CDH, which was that since we have no permit, a change to interim status would be acceptable. Because of this new direction being given by CDH, we anticipate a one to three month delay in the scheduled construction start date.

Please forward the enclosed letter to CDH. If you have any questions, please contact Allen Schubert on extension 5251 or Kyle Peter on extension 6345.

*J.M. Kersh*  
J.M. Kersh, Associate General Manager  
Environmental & Waste Management

KGP:aaf

Orig. and 1 cc - R.M. Nelson, Jr.

Enclosures:  
As Stated

## CLASSIFICATION:

UNCLASSIFIED  
CONFIDENTIAL  
SECRET

AUTHORIZED CLASSIFIER  
SIGNATURE

*[Signature]*  
DATE 6/5/91

REPLY TO LTR NO.

## APPROVALS:

*[Signature]*  
SIG & TYPIST INITIALS

*[Signature]*  
46469 (Rev. 3/91)  
R-0184-91

ADMIN RECORD

A-SW-001241

1064

DRAFT

DRAFT

DRAFT

Mr. Gary Baughman, PE  
Unit Leader, Hazardous Waste Facilities  
Colorado Department of Health  
Hazardous Materials and Waste Management Division  
4210 East 11th Avenue  
Denver, Colorado 80220

Dear Mr. Baughman:

Enclosed is a copy of the minutes from our May 22, 1991, meeting held at the Colorado Department of Health offices. The purpose of the meeting was to discuss the design and permitting of a new process waste evaporator in Building 374. Unless we hear otherwise from your office, we will assume that the meeting minutes accurately reflect the discussions.

If you have any questions, please contact Jim Kiefer of my staff at 966-5924 or Allen Schubert of EG&G Rocky Flats, Inc. at 966-5251.

cc:

A. L. Schubert, EG&G Rocky Flats, Inc.  
P. W. Edrich, EG&G Rocky Flats, Inc.

2064

## BUILDING 374 WASTE SYSTEM EVAPORATOR MEETING

DATE: May 22, 1991

TIME: 9:10 a.m. - 10:20 a.m.

ATTENDEES:

Fred Dowsett, CDH  
Jim Kiefer, DOE, RFO  
Pam Edrich, EG&G  
Tom Johnson, EG&G

Gary Baughman, CDH  
Steve Howard, DOE, RFO  
Kyle Peter, EG&G

Tom Johnson presented an overview of the Building 374 Waste System Evaporator (WSE) including project scope, justification, history and schedules. Kyle Peter then presented information on the proposed RCRA permitting strategy, including the following:

1. A permit modification to Unit 42, "Process Waste Treatment Facility: Building 374," is being prepared and is expected to be submitted to CDH in September, 1991. Since we do not anticipate having a RCRA Part B Permit for Unit 42 at the time the request would be submitted to CDH, we would submit this modification as a request for change to interim status.
2. The WSE will handle low-level mixed waste only and will not involve any additional container storage areas.
3. Because the additional WSE tank units will not result in more than a 25% increase in the existing tank storage capacity in Unit 42, this modification would qualify as a Class II Permit Modification.

Our intent was to then present information on the requirement for regulatory approvals before initiating construction as stated in DOE Order 4700.1, "Project Management System." However, CDH asked questions and made several points regarding approvals and how they expect us to proceed with the permitting process. Direction provided by CDH was as follows:

1. Since we will be receiving a Part B Permit in the near future, any "major" changes to the facility will require a permit modification and cannot be handled under a request for change to interim status. When asked to clarify what is considered a "major" change, CDH essentially said that since the permit we are about to receive will address only container storage, the WSE will be considered a major change.

2. The change to the Low-Level Mixed Waste Part B Permit will include tank storage and treatment and will therefore be considered a Class III Permit Modification. Additionally, construction of a project requiring a Class III Permit Modification may not proceed without issuance of a permit.
3. When asked by RFO and EG&G how long it would take to receive a permit for the WSE, CDH indicated that because of the extensive public comment period (approximately 105 days) and the likely requests for additional information, approval could take from six to eight months following submittal of the permit modification to CDH.
4. CDH also indicated that secondary containment for operating areas on the second floor of Building 374 would require a dedicated secondary containment system either in the form of floor drains or dikes, rather than allowing spilled liquids to drain to the first floor.

Given the position stated by CDH, the following actions will be performed by EG&G in order to expedite the permitting process:

1. Since the WSE project is broken into two distinct phases, construction of the second phase scheduled to begin in June, 1993, we will submit a permit modification containing only Phase I items. In this way, CDH will not be burdened by extraneous information which could slow the approval process. Phase I consists of installing one thin film evaporation and salt immobilization train and the distributed control system.
2. EG&G will proceed with dividing the permit modification into two separate permit modifications to reflect the two phases. Attempts will be made to expedite the present schedule and possibly have the Phase I Permit Modification to DOE by August, 1991. The presently anticipated construction start date for Phase I is January, 1992. Assuming a six to eight month approval process, the scheduled construction start date would slip by approximately one to three months.